

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

In re:

Roman Catholic Archbishop of Baltimore,

Debtor.

Case No. 23-16969-MMH
(Chapter 11)

The Official Committee of Unsecured Creditors,
Plaintiff,

Adv. Proc. No. 25-00084-MMH

v.

Roman Catholic Archbishop of Baltimore,

Defendant.

COMMITTEE’S STATUS REPORT

The Official Committee of Unsecured Creditors (the “Committee”) submits this status report pursuant to the Scheduling Order entered in this Action at Dkt. #23:

A. Dispositive Motions: As the Court is aware, the parties have briefed and had oral argument concerning the Committee’s Motion for Summary Judgment on its Counts I, II, and III and the Committee’s Partial Motion for Summary Judgment on its Count IV, as well as the Roman Catholic Archbishop of Baltimore’s (the “Debtor”) Cross-Motion for Summary Judgment (collectively with the Committee’s Motion for Summary Judgment, the “Dispositive Motions”).

As noted in its submissions concerning the Cross-Motion for Summary Judgment, the Committee’s position is that it should be entitled to further discovery prior to any order in favor of the Debtor concerning the same.

B. Party Discovery: It is the Committee's position that the Committee should be entitled to complete the discovery on the Debtor that it had noticed prior to the completion of the parties' respective briefing and argument on the Dispositive Motions in preparation for trial or in order to respond to the Debtor's affirmative Cross-Motion for Summary Judgment for the reasons described in the Committee's Opposition to the Cross-Motion. As that Opposition brief indicated, the Committee has served notices of depositions on two fact witnesses of the Debtor (John Matera and Bishop Parker) as well as a Rule 30(b)(6) notice for the deposition of a corporate representative of the Debtor. It is the Committee's understanding that the Debtor intends to produce Matera and Parker, respectively, for that 30(b)(6) deposition. The Committee has requested that the Debtor identify dates in October for these depositions and is waiting on the Debtor to provide availability for the witnesses.

It is also the Committee's understanding that the Debtor expects to complete its review of documents for a potential production of lobbying materials in its possession, custody, or control in response to the Court's September 2, 2025 and October 2, 2025 Orders concerning the same. As of the date of this status report, the Committee has received a privilege log designating eighteen line items as to which the Debtor is claiming some form of privilege and zero documents in response to those orders. The Committee anticipates that, pending the completion of the Debtor's review and production of responsive documents and parallel proceedings in the third party discovery efforts, there may be further discovery disputes that may require intervention by the Court.

C. Third-Party Discovery: The Committee continues to seek document productions and deposition testimony from non-party the Maryland Catholic Conference (the "MCC") in response to its third-party subpoena issued in this case. The Court's September 2, 2025 Order

obligated the MCC to “confirm in a writing to the Plaintiff that the Plaintiff has all Public Information” (defined to mean all external or public facing statements, releases, letters, or other documents related to the information requested by the subpoena). The Committee is in receipt of an October 2, 2025 letter from counsel for the MCC, enclosing two documents and indicating that “[a]fter a reasonable and diligent search by my client, these are the only items that were found that are potentially responsive to the Court’s order.”

The Committee is reserving its rights to inquire further as to the MCC’s representation concerning the completeness of its production with respect to the September 2, 2025 Order, particularly given the pendency of its review of the Debtor’s final production of documents and/or identification of other documents as to which the Debtor claims a privilege. Among other things, it would appear that the MCC has interpreted the September 2 Order to mean *only* “public facing statements”; the Committee’s interpretation of that Order was that it should include “external . . . statements”, such as those between the MCC and state representatives. The Committee’s preliminary review of the Debtor’s privilege log provided on October 2 has led it to believe that such external communications from the MCC to state representatives are likely to exist, and the

Committee does not believe any such communications have been produced.

Date: October 9, 2025.

Respectfully submitted,

/s/ Alan M. Grochal

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of October, a copy of the foregoing status report was served via the Court's CM/ECF e-filing system on the following:

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/s/ Alan M. Grochal _____
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